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Robin Kelly
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Kelly,
The purpose of this letter is to respond to your letter dated July 17, 2013 regarding the July Quarterly Report (4/01/12-6/30/12) of American Action Network Inc.

All 48-hour reports were filed in a timely manner. As noted in your letter, Schedule E of this report and the relevant 48-hour reports list payment dates for independent expenditures, not dissemination dates. The dissemination date of each independent expenditure is listed below per your request.

Your letter also inquires about the reporting of contributions to American Action Network Inc. and suggests that the July Quarterly Report include this information. The Commission's regulations require the disclosure of contributions only when a contribution was made for the purpose of furthering the reported independent expenditure. 11 C.F.R. 109.10(e)(1)(vi). American Action Network Inc. had no such contributions, therefore, no contribution disclosure was required and no amendment of its July Quarterly Report is necessary. If American Action Network Inc. receives contributions that are subject to these requirements, those contributions will be reported. For purposes of future reports, the omission of contribution information should not be assumed to be an oversight. Your letter also cites 11 C.F.R. 114.10(f) which applies to solicitations made by qualified nonprofit corporations, however, the American Action Network Inc. is not a qualified nonprofit corporation. Therefore, 11 C.F.R. 114.10(f) is inapposite.

Sincerely,
Stephanie Fenjiro
 
American Action Network Inc. (C90011230)
July Quarterly Report (4/1/12-6/30/12)
48 hour Notices

Connection Strategy - Paid: 5/16/2012 - Amount: \$20,148.50
Purpose:Live-Auto Phone Calls
Candidate:Jesse Kelly
Filed:5/19/2012
Dissemination Date:5/17/2012

American Media & Advocacy Group - Paid: 4/11/2012 - Amount: \$262,538.88
Purpose: Promises TV Air Time Purchase
Candidate: Richard Mourdock
Filed: 4/14/2012
Dissemination Date: 4/13/2012

Targeted Victory - Paid: 4/11/2012 - Amount:15,000.00
Purpose: Internet Advertising & Website
Candidate: Richard Mourdock
Filed: 4/15/2012
Dissemination Date: 4/14/2012

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